

P. O. Box 191  
Sandersville, GA 31082  
May 6, 2012

Plant Washington Comments  
Georgia Environment Protection Division  
Atlanta, GA

RE: Amendment 4911-303-0051-P-01-2

Dear Georgia EPD,

I am submitting this comment in response to the published draft permit for Power4Georgians' (P4G) Plant Washington. The amendment states that Plant Washington will comply with the requirements of MATS upon start-up. While I certainly agree that the plant should be required to comply with these federal regulations, the amendment is deficient in not identifying HOW the plant will meet these requirements. In the earlier permit applications, P4G submitted specifications, modeling and analysis that provided support for its application and ensuing permit. This amendment has no such documentation to support it.

In a phone conversation and follow-up email exchange I had with EPD's Capp summarizing our discussion of the mercury limits for Plant Washington when P4G said it could limit emissions of mercury to 122 pounds per year, he wrote:

*"The proposed project will be designed to burn sub-bituminous coal (Powder River Basin, or PRB coal) and as an alternate fuel up to a 50/50 blend of eastern bituminous coal (Illinois #6) and PRB. Although the facility will be designed for use of PRB and Illinois #6 coals, the facility will also have the capability of utilizing bituminous and subbituminous coals with equivalent characteristics of PRB and Illinois #6. [page 1-1 of application] They would need to submit a new permit application to do anything different than this.*

*The proposed SO2 emissions limit has to accommodate the 100% PRB scenario and the 50/50 scenario. Further explanation of how the permit would handle this would be easier to explain on the phone. Essentially, under the 50/50 scenario, which has higher uncontrolled SO2 emissions, the SO2 scrubber is required to reduce the SO2 emissions by 98.5%. And under the 100% PRB scenario, which has lower uncontrolled SO2 emissions, the SO2 scrubber is required to reduce SO2 emissions by 97.5%.*

*Regarding NOx, the advantage of the PRB coal is very slight and I didn't mean to put much emphasis on it. We see the advantage at the Georgia Power units that don't have the best NOx control (which is SCR) yet. Because the SCRs get so much NOx control (approx. 70-90%, page 4-36 of application) and because they get more reduction when there is more NOx, the PRB advantage ends up being very slight for a new unit controlled by SCR.*

*Another advantage of the PRB coal is that it has much lower levels of Chlorine than the eastern bituminous coals. [page 10-56 of application] “*

Since the 122 lb./yr limit was based on a specific coal mix, I think that the new application and permit should specify the coal mix as well as the technology to be used to meet this much more stringent limitation and should address any changes in the levels of emissions of SO<sub>2</sub>, NO<sub>x</sub>, HCl, HF, and any other air gases that might result from this coal mix.

In the April 1, 2010, email (on the Georgiaair.org website) that Justin Fickas (MACTEC) sent to James Capp, Mr. Fickas “attached a mercury emissions calculation for PRB coal at a removal efficiency of 90%.” The attached calculation showed mercury emissions of 62.3 lb./yr. For Power4Georgians to now maintain that they will comply with a mercury emissions limit that is much lower than they have said they could do requires an analysis and methodology for doing this. As editor Richard Lamb of the Presque Isle County Advance reported on May 2, 2012, in regard to the Wolverine Coal-fired Power Plant project, “*Wolverine officials confirmed this week that they don’t believe there are any vendors willing to guarantee they could meet the new MATS and the plant remains on hold.*” For Power4Georgians to assert they have the capability to meet these standards without any documentation that they have the capability and processes in place to do so raises serious questions about this permit amendment.

To provide anything less than a full and precise accounting of the methodology and process for meeting the MATS is inadequate for the final approval of this amendment to the application for Plant Washington. Georgia’s EPD has an obligation to the people of Georgia to apply a high standard of analysis to this amendment and to deny it without the necessary documentation. Georgia’s EPD has already approved a ground water withdrawal permit for Plant Washington that has as one of its conditions, that P4G would submit by July, 2010, a plan for monitoring that ground water withdrawal. When I last asked to see a copy of this plan in April, 2012, I was again told that they have not submitted this plan. To have already approved a water withdrawal permit without a plan for monitoring that withdrawal is not protecting Georgia’s citizens and natural resources. To not enforce the provisions of that water withdrawal permit is not protecting Georgia’s citizens and natural resources. To approve an amendment to an air permit without a plan and documentation to support it is not protecting Georgia’s citizens and natural resources. Please protect Georgia, its citizens, and its natural resources by not approving this amendment as submitted.

Thank you for the work you do and for considering these comments. I look forward to your response.

Sincerely,  
Cathy Mayberry  
crmayberry@bellsouth.net